

April 19, 2014

Robert G. Heiss, Director
Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

**RE: Envirite of Ohio, Inc., EPA ID No. OHD 980 568-992
Annual Hazardous Waste Export Report for Year 2013**

Dear Mr. Heiss:

Envirite of Ohio, Inc. (Envirite), EPA ID OHD 980 568 992, writes this letter in response to your letter dated April 14, 2014, which indicates reporting deficiencies in Envirite's initial report submitted to your office on January 16, 2014. The original January 16 submission may have omitted the enclosure titled "Canadian Hazardous Waste Exports." The "Canadian Hazardous Waste Exports" report, extracted from our Administrative Information System, supplements this cover letter for information such as "Waste Description," "EPA hazardous waste number," and "DOT hazard class." This letter and enclosure addresses deficiencies outlined in your April 14 letter and the reporting requirements at 40 CFR 262.56.

Exporter:	Envirite of Ohio, Inc.
Exporter Site and Mailing Address:	2050 Central Avenue SE Canton, OH 44707
Exporter EPA ID Number:	OHD 980 568 992
Export Calendar Year Covered:	2013

Consignee #1:	Cyanide Destruct Systems 293 Saunders Road Barrie ON, L4N9A3
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Waste Description:	See enclosed report
EPA Hazardous Waste Number from 40 CFR 261:	See enclosed report
DOT Hazard Class:	See enclosed report

Total Number of Shipments:	5
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Amount pursuant to **Shipment # 1**, EPA Notice 003900/12E/11, Prenote 528217, Manifest ID's 010307712JJJ 010307711JJJ, and 010307710JJJ: **14,053 Kg**

Amount pursuant to **Shipment # 2**, EPA Notice 007095/5E/13, Prenote 532604, Manifest ID 010335170JJJ: **15,907 Kg**

Amount pursuant to **Shipment # 3**, EPA Notice 007095/5E/13, Prenote 532604,
Manifest ID 010335359JJJ: **16,870 Kg**

Amount pursuant to **Shipment # 4**, EPA Notice 007095/5E/13, Prenote 532604,
Manifest ID 010336224JJJ: **17,802 Kg**

Amount pursuant to **Shipment # 5**, EPA Notice 007095/5E/13, Prenote 532604,
Manifest ID 01336507JJJ: **15,191 Kg**

Consignee #1 Waste Total Amount: 79,823 Kg

Consignee #1 Transporters: Harold Marcus, Limited
EPA ID: MIT270012321

Consignee #2: Stalex Canada, Inc.
760 Industrial Boulevard
Blainville, QC J7C3V4

Waste Description: See enclosed report
EPA Hazardous Waste Number
from 40 CFR 261: See enclosed report
DOT Hazard Class: See enclosed report

Total Number of Shipments: 1

Amount Pursuant to Shipment #1, EPA Notice 004636/4E/12, Prenote ID 528890,
Manifest 010308794JJJ: **14,447 Kg**

Consignee #2 Waste Total Amount: 14,447 Kg

Consignee #2 Transporters: Freehold Cartage, Inc.
EPA ID: NJD054126164

Consignee #3 Newalta Corporation
1731 Pettit Road
Fort Erie, ON Canada L2A 5M4

Waste Description: See enclosed report
EPA Waste Number
from 40 CFR 261: See enclosed report
DOT Hazard Class: See enclosed report
Total Number of Shipments: 2

Amount Pursuant to Shipment #1, EPA Notice 005717/10E/12, Prenote 530534,
Manifest 010307571JJJ: **9,610 Kg**

Amount Pursuant to Shipment #21, EPA Notice 005717/10E/12, Prenote 530534,
Manifest 010335806JJJ: **8,574 Kg**

Consignee #3 Waste Total Amount: 18,184 Kg

**Consignee #3 Transporters: Harold Marcus Limited
EPA ID: MIT270012321**


**Hazmat Environmental Group
EPA ID: NYD980769947**

Envirite of Ohio, Inc. is a hazardous waste treatment storage and disposal facility (TSDF) currently operating under a RCRA Part B Permit. Whenever possible and practical to do so, hazardous waste toxicity is reduced by either chemical or solidification/stabilization treatment. However, there are some wastes, due to their Matrices and/or hazardous constituents, that are not completely responsive or conducive to this type of treatment and whose level of toxicity cannot be reduced.

Envirite of Ohio, Inc. experiences variations in hazardous waste volume and toxicity from year to year due to generator variability.

CERTIFICATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.


Anthony Dugan, QEHS Manager

04 19 2014
Date

If you should require additional information, please do not hesitate to contact me at (330) 617-4309

Sincerely,


Anthony Dugan
QEHS Manager
Envirite of Ohio, Inc.
330-617-4309
anthony.dugan@eqonline.com

CC: Mr. Scott Nelson, EPA

Canadian Hazardous Waste Exports

Primary Exporter: 25- EQ Ohio

2050 CENTRAL AVE. SE CANTON, OH 44707

EPA ID# OHD 980 568 992

00-EQ Ohio

Destination Facility: Cyanide Destruct Systems (CYANIDE DEST) - EPA ID# CDP 000 000 494

293 SAUNDERS ROAD, BARRIE ON L4N9A3

Prenote Distinct Manifest Count: 3

Prenote Kg Total: 14053

Prenote: 528217

AOC: A4050

Receipt Date	Receipt	Manifest	Waste Description	Waste Codes	UN/NA Haz Class	Kg
Loads Transported by: Harold Marcus Limited			EPA ID: MIT270012321			
02/18/2013	58497 - 1	010307712JJK - 1	Waste Cyanide solutions, n.o.s. (Cyanide)	D002, D003, F007	1935 6.1	2272
02/18/2013	58497 - 2	010307712JJK - 2	Waste Cyanide solutions, n.o.s (Sodium Cyanide)	D002, D003, F007, F008	1935 6.1	681
02/18/2013	58497 - 3	010307712JJK - 3	Waste Cyanide solutions, n.o.s (Cyanide)	D002, D003, F007	1935 6.1	3533
02/18/2013	58497 - 4	010307712JJK - 4	Waste Cyanides, inorganic, solid, n.o.s. (Sodium Cyanide)	D003, D006, F008	1588 6.1	924
02/18/2013	58499 - 1	010307711JJK - 1	Waste Cyanide solutions, n.o.s. (Sodium Cyanide)	D002, D003, F008, F009	1935 6.1	454
02/18/2013	58499 - 2	010307711JJK - 2	Waste Cyanide solutions, n.o.s (Sodium Cyanide)	D002, D003, D006, F007, F008	1935 6.1	3863
02/18/2013	58499 - 3	010307711JJK - 3	Waste Corrosive liquids, toxic, n.o.s. (Sodium Cyanide, Sodium Hydroxide)	D002, D003, D006, F008	2922 8	427
02/18/2013	58499 - 4	010307711JJK - 4	Waste Corrosive liquids, toxic, n.o.s. (Sodium Cyanide, Sodium Hydroxide)	D002, D003, D006, F008	2922 8	854
02/18/2013	58683 - 1	010307710JJK - 1	Waste Cyanides, inorganic, solid, n.o.s. (Cyanide)	D003, F006	1588 6.1	909
02/18/2013	58683 - 2	010307710JJK - 2	Waste Corrosive liquids, toxic, n.o.s. (Sodium Hydroxide, Sodium Cyanide)	D002, D003, D006, F007	2922 8	136

Destination Facility: STABLEX CANADA, INC. (STABLEX) - EPA ID# NYD 980 756 415

760 INDUSTRIAL BLVD., BLAINVILLE QC J7C3V4

Prenote Distinct Manifest Count: 1

Prenote Kg Total: 14447

Prenote: 528890

AOC: A1040

Receipt Date	Receipt	Manifest	Waste Description	Waste Codes	UN/NA Haz Class	Kg
Loads Transported by: FREEHOLD CARTAGE, INC.			EPA ID: NJD054126164			
04/29/2013	59774 - 1	010308794JJK - 1	Environmentally hazardous substances, liquid, n.o.s. (Chromium, Lead)	D007, D008	3082 9	2487
04/29/2013	59774 - 2	010308794JJK - 2	Environmentally hazardous substances, liquid, n.o.s. (Mercury)	D009	3082 9	1338
04/29/2013	59774 - 3	010308794JJK - 3	Waste Corrosive liquids, oxidizing, n.o.s. (Nitric Acid, Sulfuric Acid)	D001, D002	3093 8	21
04/29/2013	59774 - 4	010308794JJK - 4	Waste Oxidizing liquid, n.o.s. (Ammonium Nitrate)	D001, D006	3139 5.1	210
04/29/2013	59774 - 5	010308794JJK - 6	Waste Corrosive liquid, acidic, inorganic, n.o.s., (Phosphoric Acid)	D002, D007	3264 8	363
04/29/2013	59774 - 6	010308794JJK - 7	Waste Corrosive liquid, acidic, inorganic, n.o.s. (Sulfuric Acid, Hydrochloric Acid)	D002	3264 8	181
04/29/2013	59774 - 7	010308794JJK - 8	Waste Corrosive liquid, acidic, inorganic, n.o.s. (Sulfuric Acid)	D002	3264 8	9847

1/15/2014 12:40 PM

Canadian Hazardous Waste Exports

Primary Exporter: 25- EQ Ohio

2050 CENTRAL AVE. SE CANTON, OH 44707

EPA ID# OHD 980 568 992

00-EQ Ohio

Destination Facility: NEWALTA CORPORATION (NEWALTAON) - EPA ID# A65 004 6

1731 PETTIT ROAD, FORT ERIE ON CANADA L2A 5M4

Prenote Distinct Manifest Count: 2

Prenote Kg Total: 18183

Prenote: 530534

AOC: A4090

Receipt Date	Receipt	Manifest	Waste Description	Waste Codes	UN/NA	Haz Class	Kg
Loads Transported by : Harold Marcus Limited			EPA ID: MIT270012321				
01/23/2013	58349 - 1	010307571JJK - 2	Waste Corrosive liquid, acidic, inorganic, n.o.s. (Sulfuric Acid)	D002	3264	8	3249
01/23/2013	58349 - 2	010307571JJK - 3	Waste Corrosive liquid, acidic, inorganic, n.o.s. (Sulfuric Acid)	D002	3264	8	90
01/23/2013	58349 - 3	010307571JJK - 4	Waste Corrosive liquid, acidic, inorganic, n.o.s. (Ammonium Bifluoride, Zinc Chloride)	D002	3264	8	272
01/23/2013	58349 - 4	010307571JJK - 1	Waste Corrosive liquid, acidic, inorganic, n.o.s. (Sulfuric Acid)	D002	3264	8	5999
Loads Transported by : Hazmat Environmental Group, Inc.			EPA ID: NYD980769947				
09/09/2013	62293 - 1	010335806JJK - 1	Waste Corrosive liquid, acidic, inorganic, n.o.s. (Nitric Acid)	D002, D007	3264	8	4476
09/09/2013	62293 - 2	010335806JJK - 2	Waste Corrosive liquid, acidic, inorganic, n.o.s. (Nitric Acid)	D002, D007	3264	8	363
09/09/2013	62293 - 3	010335806JJK - 3	Waste Oxidizing solid, n.o.s. (Potassium Persulfate)	D001	1479	5.1	3730
09/09/2013	62293 - 4	010335806JJK - 4	Waste Oxidizing solid, n.o.s. (Chromium Trioxide)	D001, D005, D007	1479	5.1	4
09/09/2013	62293 - 5	010335806JJK - 5	Environmentally hazardous substances, solid, n.o.s. (Cadmium)	D006	3077	9	21Kg

Destination Facility: Cyanide Destruct Systems (CYANIDE DEST) - EPA ID# CDP 000 000 494

293 SAUNDERS ROAD, BARRIE ON L4N9A3

Prenote Distinct Manifest Count: 4

Prenote Kg Total: 65770

Prenote: 532604

AOC: A4050

Receipt Date	Receipt	Manifest	Waste Description	Waste Codes	UN/NA	Haz Class	Kg
Loads Transported by : Harold Marcus Limited			EPA ID: MIT270012321				
05/29/2013	60546 - 1	010335170JJK - 1	Waste Cyanide solutions, n.o.s. (Sodium Cyanide, Silver Cyanide)	D002, D003, D011, F007	1935	6.1	15907
07/05/2013	60957 - 1	010335359JJK - 1	Waste Cyanides, inorganic, solid, n.o.s. (Sodium Cyanide)	F011	1588	6.1	90
07/05/2013	60957 - 2	010335359JJK - 2	Waste Cyanides, inorganic, solid, n.o.s. (Sodium Cyanide)	F011	1588	6.1	165
07/05/2013	60957 - 3	010335359JJK - 3	Waste Cyanide Solutions, n.o.s. (Sodium Cyanide)	F007	1935	6.1	1274
07/05/2013	60957 - 4	010335359JJK - 4	Waste Cyanide Solutions, n.o.s. (Sodium Cyanide)	F007	1935	6.1	254
07/05/2013	60957 - 5	010335359JJK - 5	Waste Cyanides, inorganic, solid, n.o.s. (Sodium Cyanide)	D003, D006, D007, F008	1588	6.1	954
07/05/2013	60957 - 6	010335359JJK - 6	Waste Cyanide Solutions, n.o.s. (Sodium Cyanide)	D003, F007	1935	6.1	4499

4/18/2014 8:47 AM

Canadian Hazardous Waste Exports

Primary Exporter: 25- EQ Ohio

2050 CENTRAL AVE. SE CANTON, OH 44707

EPA ID# OHD 980 568 992

00-EQ Ohio

Destination Facility: Cyanide Destruct Systems (CYANIDE DEST) - EPA ID# CDP 000 000 494

293 SAUNDERS ROAD, BARRIE ON L4N9A3

Prenote Distinct Manifest Count: 4

Prenote Kg Total: 65770

Prenote: 532604

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Receipt Date	Receipt	Manifest	Waste Description	Waste Codes	UN/NA	Haz Class	Kg
Loads Transported by : Harold Marcus Limited			EPA ID: MIT270012321				
07/05/2013	60957 - 7	010335359JJK - 7	Waste Cyanides, inorganic, solid, n.o.s. (Sodium Cyanide)	D003, F007, F008	1588	6.1	918
07/05/2013	60957 - 8	010335359JJK - 8	Waste Corrosive liquids, toxic, n.o.s. (Sodium Cyanide, Aryl Sulfonates)	D002, D003, F007, F009	2922	8	7406
07/05/2013	60957 - 9	010335359JJK - 9	Waste Corrosive solids, toxic, n.o.s. (Sodium Cyanide, Cadmium)	D002, D003, D006, F008	2923	8	727
07/05/2013	60957 - 10	010335359JJK - 10	Waste Corrosive liquids, toxic, n.o.s. (Sodium Hydroxide, Sodium Cyanide)	D002, D003, F007, F008	2922	8	583
10/07/2013	63262 - 1	010336224JJK - 1	Waste Cyanides, inorganic, solid, n.o.s. (Sodium Cyanide)	D003, F008	1588	6.1	15907
10/07/2013	63262 - 2	010336224JJK - 2	Waste Cyanide solutions, n.o.s. (Sodium Cyanide, Silver Cyanide)	D003, D011, F007	1935	6.1	1895
11/04/2013	63865 - 1	010336507JJK - 1	Waste Cyanides, inorganic, solid, n.o.s. (Sodium Cyanide)	D003, F008	1588	6.1	7726
11/04/2013	63865 - 2	010336507JJK - 2	Waste Cyanide Solutions, n.o.s. (Sodium Cyanide)	D003, F007	1935	6.1	2501
11/04/2013	63865 - 3	010336507JJK - 3	Waste Cyanides, inorganic, solid, n.o.s. (Sodium Cyanide)	D003, F008	1588	6.1	227
11/04/2013	63865 - 4	010336507JJK - 4	Waste Cyanide solutions, n.o.s. (Sodium Cyanide, Silver Cyanide)	D003, D011, F007	1935	6.1	4737

WASTE MINIMIZATION STATEMENT:

D-coded, characteristically hazardous wastes are removed from regulation as hazardous waste by treatment to render their hazardous constituents non-hazardous. Waste minimization of the waste treatment residual generated at EQ Ohio is contrary to the business objectives of this Treatment, Storage and Disposal Facility.

Report Criteria

Company ID : 25

Profit Center : 0

Receipt Date : 1/01/2013 to 12/31/2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 14 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Dear Mr. Dugan:

As you know, primary exporters of hazardous waste must file an annual report with EPA by March 1 of each year summarizing their exports during the previous calendar year. The annual report must include all information specified in 40 CFR 262.56 of the regulations. We have now concluded our review of the annual reports filed in 2014 for shipments made during calendar year 2013.

The 2013 annual report which you filed in 2014 is deficient in the following areas:

- _____ EPA Identification number
- ✓_____ name, mailing address and site address of exporter
- _____ calendar year covered by the report
- ✓_____ name and address of each consignee

by consignee, for each hazardous waste exported:

- ✓_____ a description of the hazardous waste
- ✓_____ EPA waste number (from 40 CFR part 261, subpart C or D)
- ✓_____ DOT hazard class
- ✓_____ the name and EPA ID number of each transporter used
- ✓_____ total amount of waste shipped and number of shipments (frequency) pursuant to each notification

Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to 262.41, in even numbered years:

- _____ a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated and

_____ a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984

_____ a certification signed by the primary exporter which states:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

ACTION REQUIRED

_____ Please provide the missing information identified above in order to complete your annual report, together with an original signed certification as required by the regulation, as stated above. These items may be mailed to International Compliance Assurance Division/OFA/OECA, U.S Environmental Protection Agency (Mail Code 2254A), 1200 Pennsylvania Avenue, NW, Washington, DC 20460. Courier address: International Compliance Assurance Division/OFA/OECA, U.S. Environmental Protection Agency, Ariel Rios Building, Room 6144, 1200 Pennsylvania Avenue, NW, Washington, DC 20004. **Reports may also be faxed to 202/564-0073.**

✓
_____ Enclosed is the annual report you submitted to us. We are returning it because a report with the indicated information missing cannot be accepted for processing. Please submit a complete annual report with signed certification to either the mailing or courier addresses above

This request to provide a complete annual report does not preclude or limit the USEPA from taking an enforcement action(s) for the initial failure to submit a timely or complete annual report as is required by 40 CFR 262.56.

Sincerely,

Scott D. Heiss for

Robert G. Heiss, Director
International Compliance Assurance Division
Office of Federal Activities

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature X <i>Donna J. Grody</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: ANTHONY DUGAN EQ OTHO INC. 2050 CENTRAL AVENUE SE CANTON, OH 44707</p>		<p>B. Received by (Printed Name) <i>DONNA CROSS</i></p>	<p>C. Date of Delivery <i>4-17-14</i></p>
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number (Transfer from service label)</p>		<p>7008 3230 0000 9485 0056</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>			

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com ®	
OFFICIAL USE	
Postage \$	Postmark Here
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
<p>Sent To <i>Anthony Dugan EQ, OH</i></p> <p>Street, Apt. No., or PO Box No.</p> <p>City, State, ZIP+4</p> <p><i>sent</i> APR 14 2014</p>	
<p>PS Form 3800, August 2006 See Reverse for Instructions</p>	



Mr. Scott Nelson
Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

FIRST CLASS

RECEIVED APR 28 2014

Handwritten signature

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THE ENVIRONMENTAL QUALITY COMPANY

Certified Mail

January 16, 2014

Robert G. Heiss, Director
International Compliance Assurance Division
U.S. Environmental Protection Agency
Ariel Rios Building
Mail Code 6144
1200 Pennsylvania Avenue, NW
Washington, D.C. 20004

RE: **2013 Annual Report for Export of Hazardous Waste**
Envirite of Ohio DBA EQ-Ohio, Inc., EPA ID No.: OHD 980 568 992

Dear Mr. Heiss:

Enclosed please find the 2013 Annual Report of Hazardous Waste Exports pursuant to 40 CFR 262.56 for Envirite of Ohio DBA EQ-Ohio (OHD 980 568 992).

The report entitled "Canadian Hazardous Waste Exports for 01/01/2013 through 12/31/2013 is enclosed. Please note that the report includes a "Canadian Hazardous Wastes Exports" report. Because there could be many prenates / AOCs associated with each manifest, the total number of shipments to each facility is as follows:

Cyanide Destruct Systems – 5 Loads

Prenote : 528217 (14053 Kg) Manifest(s) 010307712JJK, 010307711JJK, 010307710JJK

Prenote : 532604 (15907 Kg) Manifest 010335170JJK

Prenote : 532604 (16870 Kg) Manifest 010335359JJK

Prenote : 532604 (17802 Kg) Manifest 010336224JJK

Prenote : 532604 (15191 Kg) Manifest 010336507JJK

(Total 79823 Kg)

Stablex Canada, Inc. – 1 Load

Pre-note : 528890 (14447 Kg) Manifest 010308794JJK

(Total 14447 Kg)

Newalta Corporation— 2 Loads

Prenote : 530534 (9610 Kg) Manifest 010307571JJK

Prenote : 530534 (8574 Kg) Manifest 010335806JJK

(Total 18184 Kg)

40 CFR 262.56 (a)(5)(i)

Envirite of Ohio DBA EQ-Ohio. is a hazardous waste treatment storage and disposal facility (TSDF) currently operating under a RCRA Part B Permit. Whenever possible and practical to do so, hazardous waste toxicity is reduced by either chemical or solidification/stabilization treatment. However, there are some wastes, due to their

EQ IS THE ANSWER ▲ WWW.EQONLINE.COM

5011 1/27/2014

11

matrix and/or hazardous constituents, that are not completely responsive or conducive to this type of treatment and whose level of toxicity cannot be reduced.

40 CFR 262.56 (a)(5)(ii)

Envirite of Ohio DBA EQ-Ohio experiences variations in hazardous waste volume and toxicity from year to year due to generator variability.

CERTIFICATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.



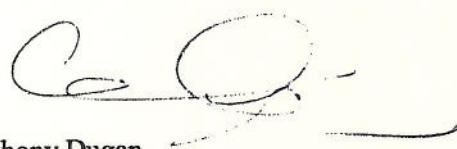
Anthony Dugan, QEHS Manager

01 16 14

Date

If you should require additional information regarding the above, please contact me at 330-617-4307

Sincerely,



Anthony Dugan
QEHS Manager

Enclosure

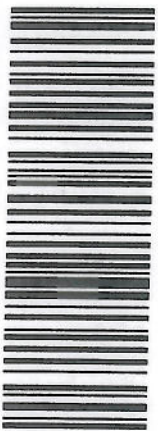
Cc: Scott Maris, EQ
Jason Evens, Envirite of Ohio

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THE ENVIRONMENTAL QUALITY COMPANY
EQ OHIO
2050 CENTRAL AVENUE SE
CANTON, OHIO 44707

RECEIVED JAN 24 2014



2041 5965 5000 0980 2002

U.S. POSTAGE
PAID
CANTON, OH
44708
JAN 16, 14
AMOUNT

\$6.11

00038309-15

Robert G. Heiss Director
International Compliance Assurance Division
U.S. Environmental Protection Agency
Ariel Rios Building
Mail code 6144
1200 Pennsylvania Ave. NW
Washington, D.C. 20544

09460

RETURN RECEIPT
REQUESTED



55555540002

70020860000559651402



Certified

Department: 2254A

Mailstop ARIEL RIOS SOUTH

To: Heiss, Robert

Route EPA Mail



343

13

Nelson, Scott

From: Anthony Dugan <Anthony.Dugan@eqonline.com>
Sent: Monday, April 21, 2014 3:17 PM
To: Nelson, Scott
Subject: Envirite of Ohio, Inc. Export Report, Revised
Attachments: removed.txt; Envirite of Ohio Export Report Revised Submitted 04 21 2014.pdf

Good Afternoon Mr. Nelson,

I left you a voicemail this morning regarding Envirite of Ohio's revised Annual Export Report. I thought perhaps at your convenience you would glance at the attachment and advise whether you'd like yet a different letter format before I mailed the hardcopy - I worked on it over the weekend and I'm not sure there's a perfect way to report.

To avoid any delay, this afternoon I Certified Mailed the hardcopy revised report (attached herein) to you and to Mr. Heiss.

I apologize sincerely for the inconvenience I caused you by omitting the "Canadian Hazardous Waste Exports" report from the original January submittal.

Please do not hesitate to contact me if you need more information or a different format - I'm keeping the file and all back-up on the corner of my desk and at my fingertips. Have a good day.

Regards,



Anthony Dugan
QEH&S Manager

EQ – The Environmental Quality Company
EQ Ohio, Inc.

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From: Anthony Dugan
Sent: Thursday, April 17, 2014 4:11 PM
To: 'Heiss.robert@Epa.gov'
Cc: Jim Conn
Subject: Envirite of Ohio, Inc. Export Report

Dear Mr. Heiss,

RE: Envirite of Ohio, Inc. OHD 980 568 992 Export Report

I tried reaching you by phone this afternoon; I left you a message with my contact information (below as well). I received your letter this afternoon notifying Envirote of Ohio, Inc. of deficiencies within its Annual Export Report submitted to your office January 16, 2014.

Please note the January submittal was formatted based on prior year reporting. It appears last year's report was accompanied by Canadian Export information extracted from our operating system database which satisfied the reporting requirements which are deficient in this year's report.

I have reviewed our electronic filing system and the various pdf files associated with the January 2014 Export report - the files extracted from our operating system for exports during year 2013 exist in our electronic filing system, unfortunately these documents which include vital information may not have been enclosed with this year's report.

Those files are at my fingertips. I may forward them to you or reformat the report itself to include all information such as Envirote of Ohio, Inc. ID/address, name of consignee, description of wastes, EPA waste numbers, DOT Hazard Class, and Transporter ID's. We provided total amounts and frequency, however I believe this deficiency relates to the need for "amounts" to be tied to pre-notifications, which I will also provide.

I apologize for any inconvenience. Please forgive me as this is my first year within our regulatory group (I've developed many gray hairs as a result). Most importantly, I wish to reconcile the deficiency immediately. I look forward to hearing from you so I may do say in what manner is easiest for you. Your time is greatly appreciated.

Regards,



Anthony Dugan
QEH&S Manager

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